

1 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
A Limited Liability Partnership
2 Including Professional Corporations
NEIL A.F. POPOVIĆ, Cal. Bar No. 132403
3 ANNA S. McLEAN, Cal. Bar No. 142233
TENAYA RODEWALD, Cal. Bar No. 248563
4 LIÊN H. PAYNE, Cal. Bar No. 291569
JOY O. SIU, Cal. Bar No. 307610
5 Four Embarcadero Center, 17th Floor
San Francisco, California 94111-4109
6 Telephone: 415.434.9100
Facsimile: 415.434.3947
7 Email: npopovic@sheppardmullin.com
amclean@sheppardmullin.com
8 trodewald@sheppardmullin.com
lpayne@sheppardmullin.com
9 jsiu@sheppardmullin.com

10 Attorneys for Defendant,
SEAGATE TECHNOLOGY LLC

12 UNITED STATES DISTRICT COURT

13 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

15 IN RE SEAGATE TECHNOLOGY LLC
LITIGATION

17 CONSOLIDATED ACTION

Case No. 3:16-cv-00523-JCS

**DECLARATION OF MARY PANENO IN
SUPPORT OF SEAGATE'S OPPOSITION
TO PLAINTIFFS' MOTION FOR CLASS
CERTIFICATION**

Date: March 30, 2018
Time: 9:30 a.m.
Place: Courtroom G
Judge: Hon. Joseph C. Spero

Second Consolidated Amended Complaint
filed: July 11, 2016

DECLARATION OF MARY PANENO

I, Mary Paneno, declare as follows:

1. I have personal knowledge of the facts set forth herein, which are known by me to be true and correct, and if called as a witness, I could and would competently testify thereto.

2. I currently work as the Corrective and Preventive Action (CAPA) Director in the Corporate Quality Department at Seagate Technology LLC's ("Seagate") facility in Bloomington, Minnesota. I was certified by the International Register of Certificated Auditors (IRCA) and have received ongoing training on standards created by the International Organization for Standardization (ISO). I have worked at Seagate for 38 years. For the past 26 years, one of my roles at Seagate has involved managing Seagate's compliance with ISO standards.

3. ISO standards are a set of internationally-recognized standards that demonstrate that a company has developed good management practices. The ISO 9001 standard, which Seagate is certified in, specifically looks at a company's quality management. ISO9001 certification includes, among other things, examining Seagate's product development process, reliability testing, quality controls, supplier controls, and ship holds process.


4. Seagate's drive design and manufacturing processes have been ISO-certified since 1993. True and correct copies of ISO certificates indicating certification since 1996 (for Longmont) and 1999 (for other sites) to present are available on Seagate's website at <https://www.seagate.com/global-citizenship/iso-9001-certification/>.

5. Seagate has received ISO certification through external accreditors DEKRA and, more recently, National Quality Assurance (NQA).

6. In addition to these independent audits, Seagate requires each of its sites to complete an internal audit annually to ensure that its design and manufacturing processes comply with ISO standards. Seagate's internal auditors receive ISO9001 training through an IRCA or RAB certified registration body. Seagate further requires that its suppliers also receive ISO certification.

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct.

3 Executed on this 4th day of January, 2018, at Bloomington, Minnesota.
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6  1/4/2018
7 Mary Paneno
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